



LAKEWOOD
CHURCH

March 1, 2010

Chairman Julius Genachowski
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Protection and Licensing of Wireless Microphone Systems
WT Docket No. 08-166, WT Docket No. 08-167, ET Docket No. 10-24

Dear Chairman Genachowski:

For the last couple of years, Lakewood Church, Led by our senior Pastor, Joel Osteen, joined with dozens of other churches, representing over 1 million Houses of Worship across the US, in expressing to the Federal Communications Commission ("Commission") our serious concern, that changes in the "White Spaces" proceeding would result in significant harm to the wireless microphone operations we rely on as part of our worship services. Recently, the Commission issued a Further Notice of Proposed Rulemaking that potentially may address some of these concerns pending final outcome. I am writing today to encourage the Commission to take the steps necessary to protect the wireless microphone operations of Houses of Worship by expanding the classes of parties eligible for Part 74 licensing, to include Houses of Worship.

With 30,000 people worshipping each week at Lakewood Church here in Houston, plus a television audience of 7 million, it is imperative that we have the highest quality audio and video equipment available to deliver our message. As with most modern Houses of Worship, we use a variety of methods to communicate with our congregation, including live sermons and music. We record 5 services each week, some of which are broadcast over traditional network, cable, or local television affiliates. Additional viewer's experience the services live online or through millions of podcast downloads we experience each month.

Similar to other large worship facilities, we have invested millions of dollars in high-quality audio and video systems comprised of broadcast TV cameras, digital audio mixing consoles, wireless microphone and in-ear systems, large LED image magnification screens and theatrical/intelligent lighting systems. All of this technology helps ensure our message is delivered at the highest standard of fidelity available. Without wireless systems, the style and quality of our message and the service itself would be gravely affected. A Minister having the capability of moving beyond a podium allows him or her to communicate a thought that can penetrate to the soul. Behind the constraints of a pulpit, the very same words might be perceived more as a speech.



Wireless microphones also play a key role in worship services through music. The freedom of worship leaders to move about the stage without the distraction or hazards of wires is of paramount importance, just as it would be in theater or a concert. Wireless communication by production staff, bandleaders, and TV directors all play pivotal roles, using wireless technology. As a result, the modern worship service has become a more spiritual and personal experience for congregations across this great nation.

Because of the need for multiple channels during a typical worship service, we are concerned that Houses of Worship be given the same rights to interference free wireless microphone use as other entities that rely on wireless microphone technology, such as traditional broadcasters. To ensure interference free wireless microphone use, it is imperative that Houses of Worship -- even where traditional broadcast or cable television are not involved -- be given the opportunity to receive a license under Part 74 for their wireless microphone operations. At current coarse, only a licensed use of a microphone will give any assurance of interference protection, such as being able to reserve frequencies in the geolocation database, and having priority over any other unlicensed use of the spectrum on which wireless microphones operate.

If Houses of Worship are only able to use wireless microphones on an unlicensed basis, there is no assurance that the equipment will be operational in an interference-free atmosphere. The new "White Spaces" devices entering the spectrum would be able to cause harmful interference to wireless microphone operations, irreparably damaging the ability of Houses of Worship to deliver the highest quality services that people have come to expect. This is a concern shared by ministers and worship leaders throughout the country, not just those who are producing services for broadcast.

In addition, if the Commission enacts a licensing scheme that only allows licensed wireless microphones to operate above 50mW, many Houses of Worship will need access to licenses. Depending on the environment and technical complexity of the service, operation at a power greater than 50 mW is often necessary to ensure high quality interference-free operations. Therefore, many Houses of Worship would require the ability to operate above 50 mW to maintain the integrity of their production, and thus would need access to Part 74 license.

As stated earlier, many Houses of Worship offer programming via live streaming over the Internet, downloadable podcasts and video recordings, recorded CD's and DVD's, satellite radio and TV. We also encourage the Commission to update its rules in this regard so that interference protection is not limited by overly restrictive and out-of date conditions based on conventional radio, television and cable TV operations.



In summary, we strongly support the Commission expanding the class of parties eligible to obtain a Part 74 wireless microphone license to include Houses of Worship. We urge the Commission to not give in to the big commercial interests pushing for restrictions on the expansion of eligibility for licenses. The American public has grown to expect that Houses of Worship offer high quality audio experiences as part of the worship service, which expectations can only be met through access to interference free wireless microphone use. Therefore, the public interest is served through providing licensing protection to Houses of Worship that incorporate wireless microphone technology.

Respectfully Submitted,

Reed Hall
Tour/Production Director
Joel Osteen Ministries
Sr. Director, Audio & Technical Production
Lakewood Church

CC:

Commissioner Meredith Attwell Baker
Commissioner Mignon Clyburn
Commissioner Michael J. Copps
Commissioner Robert M. McDowell